

1 WRIGHT, FINLAY & ZAK, LLP

2 Darren T. Brenner

3 Nevada Bar No.8386

4 Lindsay D. Dragon, Esq.

5 Nevada Bar No. 13474

6 7785 W. Sahara Ave., Suite 200

7 Las Vegas, NV 89117

8 (702) 475-7964; Fax: (702) 946-1345

9 dbrenner@wrightlegal.net

10 ldragon@wrightlegal.net

11 *Attorneys for Plaintiff, U.S. Bank, National Association, as Successor Trustee to Wachovia Bank, N.A., as Trustee for the Certificateholders of the MLMI Trust, Mortgage Loan Asset-Backed Certificates, Series 2005-A8*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 U.S. BANK, NATIONAL ASSOCIATION,
12 AS SUCCESSOR TRUSTEE TO
13 WACHOVIA BANK, N.A., AS TRUSTEE
14 FOR THE CERTIFICATEHOLDERS OF
15 THE MLMI TRUST, MORTGAGE LOAN
16 ASSET-BACKED CERTIFICATES, SERIES
17 2005-A8,

18 Plaintiff,

19 vs.

20 FIDELITY NATIONAL TITLE INSURANCE
21 COMPANY,

22 Defendant.

23 Case No.: 2:19-cv-00584-JCM-NJK

24 **STIPULATION AND ORDER TO
25 EXTEND TIME PERIOD TO
RESPOND TO MOTION TO DISMISS
[ECF No. 40]**

26 **[First Request]**

27 Plaintiff, U.S. Bank, National Association, as Successor Trustee to Wachovia Bank, N.A.,
28 as Trustee for the Certificateholders of the MLMI Trust, Mortgage Loan Asset-Backed
Certificates, Series 2005-A8 (“U.S. Bank”) and Defendant Fidelity National Title Insurance
Company (“Fidelity”), by and through their counsel of record, hereby stipulate and agree as
follows:

1. On November 4, 2022, U.S. Bank filed its First Amended Complaint [ECF No. 37];
2. On December, 5, 2022, Fidelity filed a Motion to Dismiss [ECF No. 40];

1 3. U.S. Bank's deadline to respond to Fidelity's Motion to Dismiss is currently
2 December, 19, 2022;
3 4. U.S. Bank's counsel is requesting an extension until Friday, January 6, 2023, to file
4 its response to the pending Motion to Dismiss;
5 5. This extension is requested to allow counsel for U.S. Bank additional time to review
6 and respond to the points and authorities cited to in the pending Motions;
7 6. Counsel for Fidelity does not oppose the requested extension;
8 7. This is the first request for an extension which is made in good faith and not for
9 purposes of delay.

10 **IT IS SO STIPULATED.**

11 DATED this 19th day of December, 2022.

12 WRIGHT, FINLAY & ZAK, LLP

13 /s/ Lindsay D. Dragon, Esq.

14 Lindsay D. Dragon, Esq.
15 Nevada Bar No. 13474
16 7785 W. Sahara Ave., Suite 200
17 Las Vegas, NV 89117
18 Attorneys for Plaintiff, U.S. Bank, National
19 Association, as Successor Trustee to
 Wachovia Bank, N.A., as Trustee for the
 Certificateholders of the MLMI Trust,
 Mortgage Loan Asset-Backed Certificates,
 Series 2005-A8

1 DATED this 19th day of December, 2022.

2 SINCLAIR BRAUN LLP

3 /s/ Kevin S. Sinclair

4 Kevin S. Sinclair, Esq.
5 Nevada Bar No. 12277
6 16501 Ventura Boulevard, Suite 400
7 Encino, California 91436
8 Attorney for Defendant, Fidelity National
9 Title Insurance Company

10 **IT IS SO ORDERED.**

11 Dated December 19, 2022.

12 
13 _____
14 UNITED STATES DISTRICT COURT JUDGE